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REMARKS

By this amendment, claims 1 and 8 have been amended and claim 9 has been cancelled. Accordingly, claims 1-8 are currently pending in the application, of which claims 1, 5 and 8 are independent claims. Applicants appreciate the indication that claims 5 and 6 are allowed.

In view of the above amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Priority Documents

In the Office Action, the Examiner stated that, although claim for foreign priority has been made, a certified copy of Korean Patent Application No. 2000-50546 has not been filed yet. However, our record indicates that a certified copy of Korean Patent Application No. 2000-50546 and the claim for foreign priority have been filed together on February 4, 2004. Enclosed is a copy of the documents that were filed.

Rejections Under 35 U.S.C. §102

Claims 1-4, 7 and 9 stand rejected under 35 U.S.C. §102(e) as being anticipated by U. S. Patent No. 6,469,764 issued to Kim, *et al.* ("Kim"). Applicants respectfully traverses this rejection for at least the following reasons.

In the Office Action, the Examiner stated "Applicant has merely claimed a "shading" film on the insulting substrate with a certain plane view. Kim et al. teach a film that is considered as shading film as it has the same structure as the shading film claimed. Thus, there is not structural difference between Kim et al. and the invention as claimed" (Office Action, page 4).

In this response, claim 1 has been amended to incorporate the limitation of its dependent claim 9. Amended claim 1 recites “a shading film formed on the insulating substrate and *covering a texture around the domain defining member*”. Claim 9 has been cancelled accordingly.

Regarding claim 9, the Examiner asserted “the shading film covers a texture around the domain defining member. Since the shading film outlines and covers a portion of the domain defining member it also covers any the texture around the domain-defining member” (Office Action, page 3). This assertion is respectfully disagreed with.

Kim teaches a pixel electrode 25 and a counter electrode 24 (i.e., common electrode) are formed on the same substrate, which is called a in-plane switching (IPS) mode liquid crystal display. The particular configuration shown in Fig. 3 of Kim shows the counter electrode 24 includes the first electrode 24a having a rectangular shape and the second electrode 24b dividing the space surrounded by the first electrode 24a into three sub-pixel regions. The pixel electrode 25 comprises the first branch 25a (vertically dividing each of the sub-pixel region) and the second branch 25b (horizontally dividing each of the sub-pixel region).

When there is a certain level of voltage difference between the counter electrode 24 and the pixel electrode 25, electric field having an X shaped is formed in each sub-pixel region as shown as arrows in Fig. 3. Thus, the combination of the counter electrode 24 and the pixel electrode 25 divides each sub-pixel region into four domains in each sub-pixel region . It is not possible to form such the electric filed only with the pixel electrode. Both the counter electrode 24 and the pixel electrode 25 are required with a certain level of voltage difference should exist therebetween. Thus, it is submitted that both the counter electrode 24 and the pixel electrode 25 correspond to the claimed domain-defining member.

In the Office Action, the Examiner stated “Kim et al. disclose... a shading film 24 ... The domain-defining member is the projection 25b of the pixel electrode and the opening formed between the projection 25b”. However, as explained above, the counter electrode 24 is an essential part in defining the domains in each sub-pixel region. Without the counter electrode 24, there would be no domains since there would be no voltage differences that forms the X shaped electric field in each sub-pixel region. Thus, it is submitted that the counter electrode 24 may correspond to the claimed domain-defining member but does not correspond to the claimed shading film.

In claim 9, the shading film is defined to cover *a texture around the domain defining member*”. As previously mentioned, the counter electrode 24 does a domain-defining function, and there is no explicit or implied teaching from Kim that the counter electrode 24 is utilized for covering textures. Kim does not show any element that is provided to cover a texture around the counter electrode 24 or the pixel electrode 25.

For these reasons, it is submitted that claim 1 is patentable over Kim. Claims 2-4 and 7 that are dependent from claim 1 would be also patentable at least for the same reasons. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §102(e) rejection of claims 1-4, 7 and 9.

Claim 8 stands rejected under 35 U.S.C. §102(b) as being anticipated by U. S. Patent No. 6,057,896 issued to Rho, et al. (“Rho”). This rejection is respectfully traversed.

In this response, claim 8 has been amended to recite “wherein said pixel electrode has a first portion overlying the shading film and a second portion surrounding the first portion, and a

first distance between the insulating substrate and the first portion is longer than a second distance between the insulating substrate and the second portion”.

In Rho, the pixel electrode 140 has a portion overlying the storage capacitor electrode 30. However, the distance between the portion and the substrate 10 is substantially smaller than the distance between the surrounding portion and the substrate. Thus, it is submitted that Rho fails to disclose or suggest “a first distance between the insulating substrate and the first portion is larger than a second distance between the insulating substrate and the second portion”.

For this reason, it is respectfully submitted that claim 8 is patentable over Rho. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §102(b) rejection of claim 8.

Other Matters

In addition to the amendments mentioned above, claims 1 and 8 have been further amended for clarification and better wording purposes only.

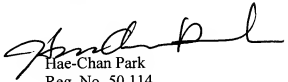
CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



Hae-Chan Park
Reg. No. 50,114

Date: May 3, 2004

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Attachment: A copy of the claim for foreign priority that was filed on February 4, 2004

Inventors: Jin-Oh KWAG, et al.

Serial No.: 09/040,457

Filing Date: August 29, 2001

For:

PANEL FOR LIQUID CRYSTAL DISPLAY

Date: February 4, 2004

Group Art.: 2815

Examiner: RICHARDS, N. Drew

Atty. Docket: 6192.0218.AA

Commissioner for Patents:

Please place the Patent Office receipt stamp hereon to acknowledge receipt of the following:

1. a transmittal letter;
2. a Claim for Priority Under 35 U.S.C. §119 in Utility Application with certified copy of Korean Patent Application No. 10-2000-0050546; and
3. two (2) acknowledgement postcards.



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February 4, 2004

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

RE: U.S. Utility Patent Application No. 09/940,457
Filed: August 29, 2001
PANEL FOR LIQUID CRYSTAL DISPLAY
Inventor: Jin-Oh KWAG, et al.
Our Ref: 6192.0218.AA

Sir:

The following documents are forwarded herewith for appropriate action by the U.S. Patent and Trademark Office:

1. a transmittal letter,
2. a Claim for Priority Under 35 U.S.C. §119 in Utility Application with certified copy of Korean Patent Application No. 10-2000-0050546; and
3. two (2) acknowledgement postcards.

It is respectfully requested that the attached copy of the postcard be stamped with the filing date of these documents and returned to our courier.

The U.S. Patent and Trademark Office is hereby authorized to charge any fee deficiency, or credit any overpayment, to our Deposit Account No. 23-1951 referencing docket number 6192.0218.AA.

Respectfully submitted,

Hae-Chan Park
Reg. No. 50,114

HCP/jeh
Enclosures

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: Jin-Oh KWAG, et al.

Art Unit: 2815

Appl. No.: 09/940,457

Examiner: RICHARDS, N. Drew

Filed: August 29, 2001

Atty. Docket: 6192.0218.AA

For: **PANEL FOR LIQUID CRYSTAL
DISPLAY**

Claim For Priority Under 35 U.S.C. § 119 In Utility Application

Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

Sir:

Priority under 35 U.S.C. §119 is hereby claimed to the following priority document(s), filed in a foreign country within twelve (12) months prior to the filing of the above-referenced United States utility patent application:

Country	Priority Document Appl. No.	Filing Date
KOREA	10-2000-0050546	August 29, 2000

A certified copy of Korean Patent Application No. 10-2000-0050546 is enclosed.

Prompt acknowledgment of this claim is respectfully requested.

Respectfully submitted,


Hae-Chan Park
Reg. No. 50,114

Date: February 4, 2004
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대한민국특허청
KOREAN INTELLECTUAL
PROPERTY OFFICE

별첨 사본은 아래 출원의 원본과 동일함을 증명함.

This is to certify that the following application annexed hereto
is a true copy from the records of the Korean Intellectual
Property Office.

출원번호 : 10-2000-0050546
Application Number

출원년월일 : 2000년 08월 29일
Date of Application AUG 29, 2000

출원인 : 삼성전자주식회사
Applicant(s) SAMSUNG ELECTRONICS CO., LTD.



2004 년 01 월 28 일

특 허 청

COMMISSIONER

